

U.S. EPA
CERCLA SECTION 104(e)
INFORMATION REQUEST

Respondent: Representatives of Lee & Eastes Tank Lines, Inc.

Site: East Waterway Operable Unit of Harbor Island Site, Seattle, WA

INFORMATION REQUEST QUESTIONS AND RESPONSES

1. Identification and Association with Subject Property

- a. Provide the full legal name and mailing address of the Respondent.

*Lee & Eastes Tank Lines, Inc.
2418 Airport Way South
Seattle, WA 98134*

- b. For each person answering these questions on behalf of Respondent, provide:

- i. full name;

Jill Eastes

- ii. title;

President

- iii. business address; and

*2418 Airport Way South
Seattle, WA 98134*

- iv. business telephone number and FAX machine number.

Telephone: 206-623-5403

- c. If Respondent wishes to designate an individual for receiving future correspondence from the EPA concerning the EWOU, please indicate so here by

providing that individual's name, mailing address, electronic mail address, telephone number, and fax number.

Clark J. Davis
Davis Law Office, PLLC
7191 Wagner Way, Suite 202
Gig Harbor, WA 98335

Email: cdavis@cjd-law.com
Telephone number: 253-858-9423

- d. Provide the address of each Subject Property, the time period when Respondent held any ownership or other interest in the Subject Property, and the type of interest held.

Respondent has never held any ownership or other interest in any Subject Property.

- e. Identify all materials used or created by Respondent's activities or operations at each Subject Property.

Not applicable.

- f. Provide copies of all documents regarding the ownership or environmental conditions of the Subject Property, including, but not limited to, deeds, sales contracts, leases, surveys, investigations, sampling, reports, blueprints, "as-builts," and photographs.

Not applicable.

- g. Provide information on the condition of the Subject Property when purchased or at the beginning of the relevant time period; describe the source, volume, and content of any fill used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.

Not applicable.

- h. Describe the activities or operations at each Subject Property including:

Not applicable.

i. the date such activities or operations commenced and concluded; and

ii. the types of activities or operations performed at each Subject Property, including but not limited to the use, storage, or disposal of any materials in an outdoor location.

- i. Describe each release of materials at or from a Subject Property, including the type and quantity of the materials, the location of the release, the impacted media, and the response.

Not applicable.

- j. Provide information on past dredging or future planned dredging in the EWOU.

We have no information on dredging the EWOU.

- l. Provide all information on electrical equipment used at the Subject Property, including transformers or other electrical equipment that may have contained polychlorinated biphenyls (PCBs).

Not applicable.

- m. Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances, pollutants, or contaminants which are or were used at the Subject Property.

Not applicable.

- n. Provide any Subject Property drainage descriptions plans or maps that include information about storm drainage which includes, but is not limited to, above or below surface piping, ditches, catch basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to each sanitary sewer.

Not applicable.

- o. With respect to past activities or operations at each Subject Property, provide copies of any stormwater or drainage studies, including data from sampling, conducted at the Subject Property. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during Respondent's occupation of the Subject Property.

Not applicable.

- p. Describe each underground storage tank present at any time on a Subject Property, including but not limited to the size and location of the tank, the materials stored in the tank, the time period of use, whether any material leaked from the tank, the type and quantity of leaked material, and the response to the leaked material.

Not applicable.

- q. Provide the names and last known address of any tenants or lessees, the dates of their tenancy and a description of the activities or operations they conducted while present at the Subject Property.

Not applicable.

- r. If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:

Not applicable.

- i. the U.S. Bankruptcy Court in which the petition was filed;
 - ii. the docket numbers of such petition;
 - iii. the date the bankruptcy petition was filed;
 - iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
 - v. a brief description of the current status of the petition.
- s. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous substances, pollutants, or contaminants, or transportation of hazardous substances, pollutants, or contaminants to or from, the Subject Property.

Not applicable.

2. Financial Information

- a. Provide true and complete copies of all federal income tax documents, including all supporting schedules, for 2015, 2016, 2017, 2018 and 2019. Provide the federal Tax Identification Number and, if documentation is not available, explain why in detail.

In that we have no association with any Subject Property, it is our understanding that we are not required to provide this information.

- b. Provide the Respondent's financial interest in, control of, or that the Respondent is a beneficiary of any assets (in the U.S. or in another country) that have not been identified in your federal tax returns or other financial information to be presented to EPA. If there are such assets, identify each asset by type of asset, estimated value, and location.

None.

- c. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

In that we have no association with any Subject Property, it is our understanding that we are not required to provide this information. Having said that, we respond that Respondent is not and was not at any time a subsidiary of or otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, other than its shareholders. Some of the shareholders of Respondent have, or may have, shares in one or more other corporations. Respondent does not consider such stock ownership to constitute affiliation with another corporation.

- i. a general statement of the nature of relationship, indicating whether the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of Respondent's business operations at the Subject Property;
- ii. the dates such relationship existed;
- iii. the percentage of ownership of Respondent that is held by such other entity(ies);
- iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- v. providing any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent associated with the Subject Property or the EWOU; and
- vi. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, new working capital (or net current assets), and net worth.

3. Insurance Coverage

- a. Provide copies of all property, casualty and/or liability insurance policies, and any

other insurance contracts referencing the Subject Property or EWOU and/or Respondent's business operations (including, but not limited to, Comprehensive General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies). Include, without limitation, all primary, excess, and umbrella policies which could be applicable to costs of environmental investigation and/or cleanup and include the years such policies were in effect.

In that we have no association with any Subject Property, it is our understanding that we are not required to provide this information.

- b. If there are any such policies from question "5.a" above which existed, but for which copies are not available, identify each such policy by providing as much of the following information as possible:

In that we have no association with any Subject Property, it is our understanding that we are not required to provide this information.

- i. the name and address of each insurer and of the insured;
 - ii. the type of policy and policy numbers;
 - iii. the per occurrence policy limits of each policy; and
 - iv. the effective dates for each policy.
- c. Identify all insurance brokers or agents who placed insurance for the Respondent at any time during the period being investigated, as identified at the beginning of this request, and identify the time period during which such broker or agent acted in this regard.

In that we have no association with any Subject Property, it is our understanding that we are not required to provide this information.

- d. Identify all communication and provide all documents that evidence, refer, or relate to claims made by or on behalf of Respondent under any insurance policy in connection with the Subject Property or EWOU. Include any responses from the insurer with respect to any claims.

Not applicable.

- e. Identify any previous settlements with any insurer in connection with the Subject Property or EWOU, or for any claims for environmental liabilities during the time period under investigation. Include any policies surrendered or cancelled by Respondent or insurer.

Not applicable.

- f. Identify all insurance, accounts paid, or accounting files that identify Respondent's insurance policies.

In that we have no association with any Subject Property, it is our understanding that we are not required to provide this information.

- g. Identify Respondent's policy with respect to document retention.

In that we have no association with any Subject Property, it is our understanding that we are not required to provide this information.

4. Compliance with this Request

- a. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

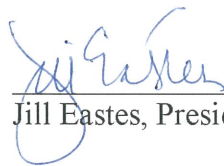
Company President Jill Eastes provided the information responding to this request, based upon her own knowledge.

- i. the name and current job title of all individuals consulted;
- ii. the location where all documents reviewed are currently kept.

Declaration

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that to my knowledge the foregoing is complete, true, and correct.

Executed on June 29, 2020.



Jill Eastes, President